

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE:)	
)	
VALLEY GREEN LANDSCAPING, INC.)	Case No. 18-11216-BFK
)	Chapter 11
Debtor-In-Possession)	
_____)	

FIRST APPLICATION FOR COMPENSATION OF COUNSEL

COMES NOW, Ashvin Pandurangi, Esq, (“Applicant”), Pursuant to 11 U.S.C. §§330 and 331, Fed R. Bankr. P. 2016(a) and Local Rule 2016-1(A), Applicant respectfully represents the following to the Court.

EMPLOYMENT AS COUNSEL FOR DEBTOR

1. Applicant was retained by Valley Green Landscaping, Inc. (“Debtor”) on or about April 4, 2018 as counsel in its Chapter 11 case. The Court entered an Order authorizing the employment of Applicant on July 17, 2018 (Docket #59).

RETAINER

2. Applicant is holding the sum of \$7,500.00 as a retainer in this case.

CASE STATUS

3. On April 6, 2018, Debtor filed the instant case under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, Case No. 18-11216-BFK.

4. Debtor continued to operate its business and manage its financial affairs as debtor in possession and timely file monthly operating reports with this Court.

5. Applicant has been in communications with Debtor's largest creditor Remax, a judgment creditor, in attempts to settle its claim.

6. Applicant has drafted a disclosure statement and Chapter 11 plan of reorganization which is expected to be filed before the end of January 2019.

SUMMARY OF SERVICES RENDERED AND HOURS EXPENDED

7. Applicant is experienced in bankruptcy matters. Pursuant to the retainer agreement, the Applicant was to be compensated at the rate of \$250.00 per hour for his services.

8. Applicant respectfully submits that the rate of \$250.00 per hour is a fair and generally accepted rate of compensation for services of the type rendered herein by Applicant.

9. Applicant has billed the debtor among two (2) general service categories.

Category 1: Case Administration: 40.9 hours (**\$10,222.50**)

Category 2: Expenses: **\$1,813.52**

10. The dates, descriptions and hours of service are more fully set forth in the Customer Invoice attached as Exhibit "A".

11. Applicant has no agreement to share any compensation which may be awarded by this Court. All services provided herein were performed by Applicant for and on behalf of the Debtor and not for or on behalf of any other person or entity.

WHEREFORE, the Applicant prays that the Court enter an Order (i) authorizing and awarding counsel fees to Ashvin Pandurangi, Esq. for services rendered and expenses paid for the period April 4, 2018 through December 12, 2018 in the amount of \$12,036.00, or in such other amount as to this Court may appear just, and authorize Applicant to withdraw the \$7,500.00 retainer balance in his trust account and apply it to the award.

Respectfully Submitted,

AP LAW GROUP, PLC

/s/ Ashvin Pandurangi_____

Ashvin Pandurangi, Esq., VSB# 86966

AP Law Group, PLC

7777 Leesburg Pike, 402N

Falls Church, VA 22043

Tel: (571) 969-6540

Fax: (571) 699-0518

ap@aplawg.com

Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of December, 2018 a true copy of the foregoing Application for Compensation was served electronically pursuant to this Court's CM/ECF procedures on: Jack I. Frankel, Esquire, Office of the U.S. Trustee, 115 South Union Street, Ste. 210, Alexandria, VA 22314; and sent first class mail, postage prepaid, to the attached list of creditors.

Alban Tractor Co. Inc.
Attn: Bankruptcy
PO Box 64251
Baltimore, MD 21264-7000

American Express
Attn: Bankruptcy
PO Box 981535
El Paso, TX 79998

CAT Financial
Attn: Bankruptcy
PO Box 330339
Nashville, TN 37203

Central Sod Farm
Attn: Bankruptcy
920 John Brown Rd.
NY 12617

Cheryl Sheppard
5833 Lewis Lane
Falls Church, VA 22041

Citibank
Attn: Bankruptcy
PO Box 6704
Sioux Falls, SD 57104

Citibank/Costco
Attn: Bankruptcy
PO Box 790046
Saint Louis, MO 63179

Commercial Account
Attn: Bankruptcy
PO Box 330339
Nashville, TN 37203

Exxon Mobil
Attn: Bankruptcy
PO Box 6404
Sioux Falls, SD 57117

Financial Services
Attn: Bankruptcy
PO Box 340001
Nashville, TN 37203

Ford Credit
Attn: Bankruptcy
PO Box 542000
Omaha, NE 68154

Gelber & Associates, PLLC
201 Park Washington Court
1st Floor
Falls Church, VA 22046

Home Depot Credit Services
Attn: Bankruptcy
PO Box 790345
Saint Louis, MO 63179

IRS
Attn: Bankruptcy
P.O. Box 931200
Kansas City, MO 64999

Landscape Supply
Attn: Bankruptcy
PO Box 12706
Roanoke, VA 24027

Martin & Gass
Attn: Bankruptcy
6433 General Green Way
Alexandria, VA 22312

Office Depot
Attn: Bankruptcy
PO Box 790449
Saint Louis, MO 63179

PNC Bank
Attn: Bankruptcy
2730 Liberty Ave.
Pittsburgh, PA 15222

Remax Allegiance
c/o Gelber & Associates
201 Park Washington Court, F1
Falls Church, VA 22046

Sanijohn Services Inc.
Attn: Bankruptcy
PO Box 1386
Beltsville, MD 20704

Shell Fleet
Attn: Bankruptcy
PO Box 6406
Sioux Falls, SD 57117

Small Business Administration
Attn: SBA/Bankruptcy
801 Tom Martin Dr. #120
Birmingham, AL 35211

Sprint
Attn: Bankruptcy
PO Box 629023
El Dorado Hills, CA 95762

United Healthcare Insurance
185 Asylum Street - 03B
Hartford, CT 06103

Wells Fargo
Attn: Bankruptcy
PO Box 29482
Phoenix, AZ 85038

EXHIBIT A

INVOICE

Invoice# INV-000327

Balance Due
\$4,536.02



AP Law Group, PLC
7777 Leesburg Pike
Suite 402N
Falls Church Virginia 22043
U.S.A

Invoice Date : 12/12/2018
Terms : Custom
Due Date : 01/16/2019

Bill To
David Sheppard

#	Task & Description	Hours	Rate	Amount
1	Initial Client Meeting	0.75	250.00	187.50
2	4/5/18 office visit - DS	0.33	250.00	82.50
3	Preparing Chapter 11 Petition	0.47	250.00	117.50
4	Drafting corporate resolution for BK	0.17	250.00	42.50
5	Drafting Suggestion of BK	0.33	250.00	82.50
6	Preparing Chapter 11 Petition	0.57	250.00	142.50
7	4/6 Office Visit - DS	0.48	250.00	120.00
8	Preparing Chapter 11 Petition	0.52	250.00	130.00
9	Preparing Chapter 11 Petition	0.12	250.00	30.00
10	Preparing Chapter 11 Petition	0.48	250.00	120.00
11	Preparing Chapter 11 Petition	0.30	250.00	75.00
12	Preparing Chapter 11 Petition	0.33	250.00	82.50
13	4/18/18 Office Visit / Preparing Petition	0.33	250.00	82.50
14	Office visit 4/20/18 - finishing petition	1.20	250.00	300.00
15	Forwarding documents to Trustee for IDI	0.32	250.00	80.00
16	4/24 Initial Debtor Interview - Preparing documents and attendance	2.00	250.00	500.00
17	4/27/18 - Filing 11 USC 1116(1)(a) documents with Court	0.42	250.00	105.00

#	Task & Description	Hours	Rate	Amount
18	5/2/18 - App to Employ Counsel	0.42	250.00	105.00
19	Contacting PNC bank and faxing BK notice	0.17	250.00	42.50
20	Preparing docs for 341	0.47	0.00	0.00
21	Preparing docs for 341	0.23	0.00	0.00
22	341 meeting of creditors	2.25	250.00	562.50
23	Motion to Approve Sale of Vehicle	0.15	250.00	37.50
24	App to Employ CPA	0.18	250.00	45.00
25	DS office visit for BK amendments	1.90	250.00	475.00
26	Motion to Approve Sale of Vehicle	0.28	250.00	70.00
27	Review/file MOR	1.10	250.00	275.00
28	Motion to Approve Sale of Vehicle	0.38	250.00	95.00
29	App to Employ CPA	0.27	250.00	67.50
30	App to Employ CFA	0.17	250.00	42.50
31	App to Employ CPA	0.08	250.00	20.00
32	App to Employ CFA	0.13	250.00	32.50
33	Amending Petition	0.95	250.00	237.50
34	Consent Order for Ad. Protection Payments (Ford)	0.50	250.00	125.00
35	Settlement negotiation with Remax	0.08	250.00	20.00
36	Preparing/forwarding requested information to Mr. Pika	0.83	250.00	207.50
37	Jonathan Gelber (Remax) phone call	0.08	250.00	20.00
38	DS Phone Call	0.10	250.00	25.00
39	Adjourned 341 meeting	1.75	250.00	437.50
40	Prelim Offer of Settlement (Remax)	0.17	250.00	42.50
41	Consent Order for Ad. Protection Payments (Ford)	0.25	250.00	62.50
42	Reviewing/forwarding memos to Trustee	0.25	250.00	62.50

#	Task & Description	Hours	Rate	Amount
43	App to Employ CFA	0.58	250.00	145.00
44	Preparing for Motion to Authorize Sale hearing	0.33	250.00	82.50
45	Motion to Authorize Sale hearing	1.00	250.00	250.00
46	Adjourned 341 meeting	1.67	250.00	417.50
47	Drafting/submitting order on motion	0.42	250.00	105.00
48	Review/file MOR	0.67	250.00	167.50
49	App to Employ CFA	0.17	250.00	42.50
50	Drafting/submitting order on motion	0.17	250.00	42.50
51	Contacting Gelber & Asocc re: PNC account release	0.33	0.00	0.00
52	Orders on App to Employ Counsel/CPA	0.33	0.00	0.00
53	Uploading docs to client file	0.08	0.00	0.00
54	Orders on App to Employ Counsel/CPA	0.17	0.00	0.00
55	DS Phone Call	0.08	250.00	20.00
56	Draft Remax Settlement Offer	0.50	250.00	125.00
57	Review/file MOR	0.67	250.00	167.50
58	Draft Remax Settlement Offer	0.33	250.00	82.50
59	Review Answers to Trustee Questions re: July MOR and forward	0.17	250.00	42.50
60	Drafting Plan of Reorganization	0.50	250.00	125.00
61	Draft Remax Settlement Offer	0.33	250.00	82.50
62	Emails with Ford and DS re: missed August payment	0.25	250.00	62.50
63	DS Phone Call	0.08	250.00	20.00
64	Reviewing/filing July 2018 MOR	0.75	250.00	187.50
65	Draft Remax Settlement Offer	0.25	250.00	62.50
66	Drafting Plan of Reorganization	0.42	250.00	105.00
67	Reviewing/forwarding debtor responses to Trustee inquiry	0.08	250.00	20.00

#	Task & Description	Hours	Rate	Amount
68	DS Phone Call	0.08	250.00	20.00
69	Jonathan Gelber (Remax) phone call	0.25	250.00	62.50
70	DS Phone Call	0.08	250.00	20.00
71	Review/file MOR	0.65	250.00	162.50
72	DS office meeting - remax settlement discussions	0.73	0.00	0.00
73	Email Response to Trustee re: August MOR	0.17	250.00	42.50
74	Email Response to Trustee re: August MOR	0.13	250.00	32.50
75	Review/file MOR	0.42	250.00	105.00
76	Drafting Plan of Reorganization	0.55	250.00	137.50
77	Drafting Plan of Reorganization	0.47	250.00	117.50
78	Drafting Disclosure Statement	0.43	250.00	107.50
79	Drafting Disclosure Statement	0.32	250.00	80.00
80	Drafting Plan of Reorganization	0.98	250.00	245.00
81	Drafting Plan of Reorganization	1.05	250.00	262.50
82	Drafting Disclosure Statement	0.08	250.00	20.00
83	Drafting Disclosure Statement	0.45	250.00	112.50
84	Review/file MOR	0.38	250.00	95.00
85	Drafting Disclosure Statement	0.77	250.00	192.50
86	Drafting Disclosure Statement	0.65	250.00	162.50
87	Drafting Disclosure Statement	0.92	250.00	230.00
88	Drafting Plan of Reorganization	1.08	250.00	270.00

#	Item & Description	Qty	Rate	Amount
89	BK filing fee	1.00	1,717.00	1,717.00
90	Postage Motion to Approve Sale: Printing Costs: 324 X .15 = 48.60 Postage Costs: 36 at the 1oz rate = 16.92	1.00	65.52	65.52

#	Item & Description	Qty	Rate	Amount
91	Postage Amended Creditor Schedule (added creditors)	1.00	31.00	31.00
Sub Total				12,036.02
Discount				(-) 7,500.00
Total				\$4,536.02
Balance Due				\$4,536.02

Notes

Thank you!

Payment Options 